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ATTORNEYS AND COUNSELORS AT LAW

ADMITTED TO THE UNITED STATES
SUPREME COURT BAR (1996)

“A VETERAN OWNED LAW FIRM”

OF COUNSEL:

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September 9, 2020

VIA, ELECTRONIC FILING AND ELECTRONIC MAILC. Jo Anne Wessinger Hill,
Standing Hearing Officer
The Public Service Commission of South CarolinaRe: • **Docket 2019-226-E** (DESC's IRP)
 • **Request for Extension**

Ms. Wessinger-Hill:

The undersigned represents the South Carolina Solar Business Alliance, Inc., (“SCSBA”), in the above-referenced Docket. Please reference Dominion Energy South Carolina, Incorporated’s (“DESC”), email to you, dated August 4, 2020. Also please reference your Directive Order of August 12, 2020, Order 2020-73-H, (both the Request and Order are attached hereto, for your ready-reference).

Our client is in receipt of DESC’s Rebuttal Testimony and Exhibits on August 28, 2020. DESC witness Bell’s Rebuttal Testimony attaches as an exhibit (EHB-3) a Supplemental IRP that reflects numerous changes to its modeling made in response to the suggestions of ORS, as well as one change requested by SCSBA. As indicated by DESC witness Neely, DESC also increased the number of scenarios it modeled, from 64 in the original IRP to 144 in the supplemental IRP. As a result, in preparing its Surrebuttal testimony SCSBA must review more than twice as much modeling information and data as it had to review in preparing its initial testimony. Given the large volume of information it must now review and analyze, SCSBA requires additional time to respond.

Accordingly, SCSBA hereby requests a two-week extension from the present due date of September 18, 2020, for SCSBA's Surrebuttal Testimony/Exhibits, until and including October 2, 2020. You will recall that SCSBA consented to a two-week extension of time for DESC to file its Rebuttal Testimony/Exhibits and we believe that a concomitant extension for SCSBA, is appropriate. In your Directive Order referenced hereinabove, you referenced “conditions”

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between DESC and SCSBA, in an email attached to DESC's request to you, also referenced hereinabove. The pertinent "condition", read as follows, "DESC will agree to any reasonable further extension requested by SCSBA or other parties in order to allow the parties reasonable time to review DESC's updated analysis prior to filing surrebuttal testimony." Therefore, SCSBA's request for an extension of time is both reasonable and appropriate.

Please advise if you require any additional information concerning this request, which is,

Respectfully Submitted,

/s/Richard L. Whitt
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*Both as Counsel for the South Carolina Solar
Business Alliance, Inc.*

September 9, 2020
Irmo, South Carolina

RLW/cas

cc: All parties of record in Docket 2019-226-E, *via electronic mail*